

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 1997

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Docket No. R97-1
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
RALPH J. MODEN (NAA/USPS-T4-1-16)
August 20, 1997**

The Newspaper Association of America hereby submits the attached interrogatories to United States Postal Service witness Ralph J. Moden (USPS-T-4) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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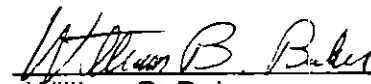

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

August 20, 1997


William B. Baker

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NAA/USPS-T4-1. Please refer to your direct testimony at page 5, lines 6-13.

- a. What percent of the 88 percent of FY98 barcoded letters are estimated to be barcoded by mailers?
- b. What percent of the 88 percent of FY98 barcoded letters are estimated to be barcoded by MLOCs?
- c. What percent of the 88 percent of FY98 barcoded letters are estimated to be barcoded by RBCs?

NAA/USPS-T4-2. Please refer to your direct testimony at page 5, lines 22-25 and page 6, lines 1-3. By how much are the planned enhancements to the MLOCs expected to improve the overall encode rate of the equipment?

NAA/USPS-T4-3. Please refer to your direct testimony at page 6, lines 7-9.

- a. How many Single Line OCRs (SLOCs) will remain in service during FY98?
- b. When are these SLOCs scheduled for replacement?

NAA/USPS-T4-4. Please refer to your direct testimony at page 8, lines 7-9.

- a. What percentage of routes currently receive DPS mail?
- b. At the end of FY98, what percentage of routes are expected to receive DPS mail?
- c. By the end of FY98, what is the expected volume of DPS mail?

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NAA/USPS-T4-5. Please refer to your direct testimony at page 8, lines 16-19.

- a. Are non-barcoded ECR high density letters ever identified and barcoded at the plant to eliminate the need for manual casing? If no, why not?
- b. Are non-barcoded ECR saturation letters ever identified and barcoded at the plant to eliminate the need for manual casing? If no, why not?
- c. Do any mailers barcode ECR high density letters? If yes, why?
- d. Do any mailers barcode ECR saturation letters? If yes, why?
- e. Are there any advantages to the Postal Service (e.g., flexibility in processing, reduced costs, improved level of service) in having mailers barcode ECR high density letters? Please explain.
- f. Are there any advantages to the Postal Service in having mailers barcode ECR saturation letters? Please explain.

NAA/USPS-T4-6. Please refer to your direct testimony at page 8, lines 19-23. What is the Postal Service's unit cost of barcoding a non-barcoded ECR basic letter?

NAA/USPS-T4-7. Please refer to your direct testimony at page 9, lines 22-26.

- a. What percentage of total zones have 10 or more city routes and/or rural routes with city style addressing?
- b. What percentage of total zones have 5 to 9 routes?
- c. How many zones with fewer than 10 routes are expected to receive DPS as a result of local decisions?

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NAA/USPS-T4-8. Setting aside the desirability of doing so, can all Standard A letter mail be entered as Standard A non-letter mail? If no, please explain which letters cannot be entered as non-letters and why.

NAA/USPS-T4-9. Please refer to your direct testimony at page 11, lines 12-14. Please explain all the reasons why, in your opinion, mailer participation in flats barcoding lags expectations.

NAA/USPS-T4-10. Please refer to your direct testimony at page 13, line 10. Please explain why the OCR on the FSM 881 is not equipped to spray a barcode on the piece.

~~NAA/USPS-T4-11. Please refer to your direct testimony at page 19, lines 21-28.~~
Assume for a given amount of expected volume that 17 letter sorting machine (LSM) employees are required. Now assume that the expected mail volume doubles with no change in the type or mix of mail to be sorted.

- a. How many LSM employees will be needed to handle the new expected volume of mail?
- b. Please explain how this staffing level is determined.

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NAA/USPS-T4-12. Please refer to your direct testimony at page 20, lines 23-30 and page 21, lines 1-5. If you were measuring how workhours vary over the long-term with volume, would you recommend excluding data during these "adjustment periods" which do not reflect "optimal productivity" at a facility? If yes, please explain why. If no, why not?

NAA/USPS-T4-13. Please refer to your direct testimony at page 21, lines 7-14.

- a. Are manual cases staffed before the "late surges" in volume or do staff arrive at the same time as these volume surges? Please explain your response.
- b. If volume doubles, will the number of employees staffing manual cases during these volume surges also double? Please explain why or why not.
- c. If less than double the employees are needed in the event of a doubling in volume, please provide an estimate of the number of employees needed to staff manual cases. Please explain how this staffing level is determined.

NAA/USPS-T4-14. Please refer to your direct testimony at page 21, lines 15-17.

- a. What do manual parcel employees do while waiting for parcels to process? Are they simply idle or are they employed in other operations while waiting for the parcels?
- b. If parcel volumes were expected to double, would the number of employees assigned to manual parcel operations double? Please explain why or why not.
- c. If less than double the employees are needed in the event of a doubling in volume, please provide an estimate of the number of employees needed to staff manual parcel operations. Please explain how this staffing level is determined.

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NAA/USPS-T4-15. Please refer to your direct testimony at page 22, lines 3-15.

- a. Are these "gateway activities" staffed to meet the expected volume of mail or is excess capacity planned to ensure that higher than expected volumes can be processed "as expeditiously as possible"? Please explain your response.
- b. Are any mail processing operations staffed to handle higher than expected mail volumes? If no, please note which mail operations are staffed in this manner and why.

NAA/USPS-T4-16. Please refer to your direct testimony at page 22, lines 17-23.

- a. If smaller facilities have a steady flow of mail to manual letters and flats operations, is productivity higher for these operations in these facilities? Please explain your response.
- b. Please provide all studies and analyses of the productivity of manual sorting operations by size of facility.